

Message

From: Crawford, Dorothy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B22442C0DAD249C1B798271CB981B12F-CRAWFORD, DOROTHY]
Sent: 1/22/2018 4:35:48 PM
To: Bates, Rita, NMENV [Rita.Bates@state.nm.us]
CC: Verhalen, Frances [verhalen.frances@epa.gov]; Intermont, Donna, NMENV [Donna.Intermont1@state.nm.us]; Singleton, Kerwin, NMENV [Kerwin.Singleton@state.nm.us]; Baca, Michael, NMENV [michael.baca1@state.nm.us]; judy.fisher@state.nm.us
Subject: RE: NMED Exceptional Event demos/Mitigation Plans/Fugitive Dust - Alternate High Wind Threshold
Attachments: 2013 5 10 Interim High Winds Guidance.pdf; 2016 Oct 3 Final Fed Reg EE Rule.pdf

FYI – I have been working with OAQPS and regional contacts on past experience for developing and evaluating Alternate High Wind Threshold. During our recent call this concept was discussed. I wanted to pass along some initial input I received. Hope for more information in the future.

Appendixes to the 2013 EPA High Wind Guidance document has some discussion of this topic. Attached for your use.

In the 2016 Exceptional Event rule, EPA indicated its intent to revise the Guidance. I also included the 2016 EE Rule federal register for information on subject topic. Have a nice day.

Dorothy Crawford
U.S. EPA, Region 6, Air Monitoring
(214) 665-2771

From: Crawford, Dorothy
Sent: Thursday, January 18, 2018 8:39 AM
To: Bates, Rita, NMENV <Rita.Bates@state.nm.us>
Cc: Verhalen, Frances <verhalen.frances@epa.gov>; 'Intermont, Donna, NMENV' <Donna.Intermont1@state.nm.us>; Singleton, Kerwin, NMENV <Kerwin.Singleton@state.nm.us>; Baca, Michael, NMENV <michael.baca1@state.nm.us>; judy.fisher@state.nm.us
Subject: NMED Exceptional Event demos/Mitigation Plans/Fugitive Dust - Anthony areas, potential future Clean Data decision

FYI – We can talk about the following during our Feb 14 call.

In preparation for Feb 14 conference call, I am researching the 'Clean Data' question. This relates to a potential mutual long term goal of re-designating the Anthony area as attainment for PM10. A Clean Data decision is just one part of the re-designation process. Clean Data for PM10 is essentially 3 years of no or limited exceedances measured at the area monitor(s) so that the Design Value (DV) for the area is <NAAQS; or sufficient exceedances being concurred on by EPA as Exceptional Events and therefore excluded from NAAQS DV calculations such that area DV <NAAQS.

I have confirmed with R6 staff familiar with Clean Data process that any exceedances which have been concurred on by EPA as Exceptional Events are *not* included in DV calculations for the Clean Data process. So Clean Data is a regulatory process where EPA Exceptional Events concurrences are applicable/valid/effective.

For anyone who wants to know more about the re-designation process (from NAAQS non-attainment to attainment), the federal register dockets for prior re-designation is a good resource. Dockets contain documents associated with re-designation. EPA R6 has conducted re-designation processes for various areas: Baton Rouge (O3), Beaumont (O3), Crittenden County AR, Frisco TX (Pb). If you google: '[AREA NAME] EPA CAA redesignation docket' you can find links to the various dockets. Here is Crittenden and Baton Rouge dockets:

<https://www.regulations.gov/docket?D=EPA-R06-OAR-2015-0852>

<https://www.regulations.gov/docket?D=EPA-R06-OAR-2016-0293>

Dorothy Crawford
U.S. EPA, Region 6, Air Monitoring
(214) 665-2771